

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

M. CELESTE BARRAS	)
	)
Plaintiff,	)
vs.	)
	)
HEALTHSOUTH MEDICAL CLINICS	)
OF ANCHORAGE, LLC & U.S	)
HEALTHWORKS HOLDING CO., INC.,	)
	)
Defendants.	)
	)

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Case No A05-0174-CV (JWS)

*RECEIVED  
JUL 28 2006  
CLERK U.S. DISTRICT COURT  
ANCHORAGE, ALASKA*

**Plaintiff's Opposition to Defendant's Motion for Attaching Rule 37.(b) (2) and D. Ak 37.1 (a) -(b)**

Plaintiff has not willfully withheld any information from defendants.

Defendants are obstructing justice with the advantage of their legal understanding of Rules and Procedures and soliciting to have the case dismissed for the plaintiff's lack of understanding these Rules and Procedures

Furthermore when defendant met face to face with plaintiff June 22, 2006 defendant was well aware that the plaintiff was employed full-time with Alaska Regional Hospital and an obligation to the current employer. Defendant is using excessive force and power that was never exhibited with either of the former attorney's which possessed the same education and experience with the legal system as the defendant. At which time the plaintiff also informed the defendant she didn't want to create another employment situation as too much time away from work will again cause the loss of a employment, stemming from the same circumstances; the disabled child. That is what this lawsuit is about.

The previous attorneys both willing withdrew from the case due to the lack of financing the plaintiff was able to provide.

We agreed to mediation, which is set for August 3<sup>rd</sup>, 2006 at 9:00 AM.

M. Celeste Barras-Rohan  
Citizen of The United States  
Born Resident of Alaska  
160 Ocean Park Drive  
Anchorage, Alaska 99515  
Telephone & Fax: (907) 336-1960  
Cell: (907) 250-4817

DATED at Anchorage, Alaska this 28<sup>th</sup> day of July 2006

M. Celeste Barras  
160 Ocean Park Drive  
Anchorage, Alaska 99515

By: M. Celeste Barras-Rohan  
Marna Celeste Barras-Rohan

**Certificate of Service**

This is to certify that on this 28<sup>th</sup> day of July 2006, a true and correct copy of the foregoing was mailed, to:

TURNER & MEDE, P.C.  
Attorneys for defendants HealthSouth  
Medical Clinics of Anchorage, LLC and  
U. S. Healthworks Holding Company, INC.  
1500 West 33<sup>rd</sup> Avenue, Suite 200  
Anchorage, Alaska 99503-3502  
Telephone: (907) 276-3963  
Fax: (907) 277-3695